

**REMARKS**

Claims 21-40 are currently pending in the application, with Claims 1-20 being cancelled and Claims 21-40 being newly added with this response. In the action dated April 11, 2008: drawings 2c, 2d, 5a, 5c, 6a, 6b, 6c, 6e, 8a, 8b, 8c, 8d, 9a, 9b, 9d, 10a, 10b, 10d, 11a, 11b, 11c, 16b, 16c, 16d, 18a, 18b, and 18d are objected for the reasons stated therein; Claim 11 is objected to for a formality reason stated therein; Claim 6 stands rejected under §112 for being indefinite; Claims 1, 3-10, 14 and 16-18 stand rejected under §102(e) as being anticipated by In US 6,367,015 to Kubo et al. for reasons stated therein; and Claims 1 and 17 stand rejected under §103 as being obvious over Applicant's Admitted Prior Art in view of US 6,571,336 to Smith et al. for reasons stated therein. No new matter has been added.

It is respectfully submitted that Claims 21-40 are in condition for allowance and early notice of the same is solicited.

With respect to the drawings, enclosed find a "Replacement Sheet" for each of the objected drawings identified by the Office. Accordingly, Applicants submit that the objection is rendered moot.

With respect to the objection of Claim 11, and rejection of Claim 6 under §112, these claims have been cancelled, thereby rendering the objection and the rejection also moot.

Regarding the rejection of independent Claims 1 and 17, the action alleges that Kubo discloses each and every element recited therein. Applicants respectfully disagree as outlined below, and the Office may verify for itself the same after a further review of Kubo. The replacement claim set including independent Claims 21, 33 and 39 are provided herein for added clarity, and Applicants respectfully submit that Kubo fails to disclose or suggest each and every element of the recited claims, now or then, and accordingly, a prima facie case of unpatentability is not established.

Applicants respectfully note that Kubo is directed to a method of entering a password in a very different manner. With reference to FIGS. 16, 24A, and 29, and in particular, referring to FIG. 29, Kubo appears to disclose a method of entering a password by placing an ID card 34 on a screen 32, and entering positions of the holes/openings/cutouts/marks of the ID card 34 by pushing the holes/openings/cutouts/marks with a pen 33. FIG. 16 of Kubo appears to disclose that the ID card 34 may have pins corresponding to the holes/openings/cutouts/marks so as to facilitate entering of the password by placing the ID card 34 on the screen 32.

However, Kubo does not teach or suggest, for example, “*displaying a matching board comprising a certain cell and a reference board comprising a cell on a user interface,*” (emphasis added) as recited in independent Claim 20, or as similarly recited in independent Claim 33. Moreover, Kubo does not teach or suggest “receiving the password corresponding to the certain cell of the matching board *matched by a user* with the cell of the reference board comprising a password symbol,” (emphasis added) as further recited in independent Claim 20, and “*displaying a movement of one of the matching board and the reference board with respect to the other* in accordance with a user interfacing with the user interface,” (emphasis added) as further recited in independent Claim 33.

Also, Kubo does not teach or suggest “displaying a first set of symbols including a symbol private to a user; displaying a second set of symbols including a symbol private to the user; and displaying matching of the symbol of the first set private to the user with the symbol of the second set private to the user, concurrently with matching of one or more other symbols of the first set with corresponding one or more symbols of the second set, to prevent revealing of the symbol of the first set and the symbol of the second set private to the user,” as recited in independent Claim 39.

Accordingly, it is submitted that a prima facie case of unpatentability has not been established and allowance of the independent Claim 21, 33 and 39 is respectfully requested.

Regarding the rejection of independent Claims 1 and 17, the action further alleges that Smith as combined with AAPA (Japanese Patent Publication No. 2000-339084 to “Kazuhiko”), renders the claim obvious. In particular, AAPA, that is, Kazuhiko, is cited for disclosing each and every element except for “a step in which a matching board and a reference board are displayed on a user interface,” and Smith is cited for disclosing the same in FIG. 4 of Smith. Applicants respectfully disagree as outlined below, and the Office may verify for itself the same after a further review of Kazuhiko and Smith.

Applicants herewith submit Japanese Patent Publication No. 2000-339084 to Kazuhiko along with an English abstract corresponding to the Japanese Patent Publication No. 2000-339084 for the benefit of the Office.

The replacement claim set including independent Claims 21, 33 and 39 are provided herein for added clarity, and Applicants respectfully submit that Kazuhiko as combined with Smith fail to disclose or suggest each and every element of the recited claims, now or then, and accordingly, a *prima facie* case of unpatentability is not established.

Applicants respectfully note that Kazuhiko and Smith are directed to a method of setting/entering a password in a very different manner.

With reference to the abstract of Kazuhiko and FIGS. 1 through 4 of Kazuhiko, Kazuhiko appears to disclose a method of setting up and entering a password using an input frame 3 and an input key 2 having a cursor (arrow buttons) in which numeric password is entered via the input frame 3. Moreover, the position of the numeric password and the input order of the numeric password are registered so that thereafter, “the password is inputted with the same numeric characters, positions and order as those registered ones (see abstract).”

With reference to FIG. 4, in particular, FIGS. 13, 14 and 15 of Smith, Smith appears to disclose a method of accessing a list of a plurality of passwords by using pattern recognition as a condition for access. That is, it appears that a password character set 700 of FIG. 13 is set in a pattern 704 of FIG. 13 with a numerical order to create a Master Grid 706 of FIG. 14 with other characters, such that the Master Code of FIG. 15 “may be identified only when the pattern has

been retraced in the grid (see also col. 9, lines 62-67).” FIG. 4 of Smith appears to disclose an integral display 94 of a computer 90 for displaying the Master Grid 706.

However, Kazuhiko does not teach or suggest, for example, “*displaying a matching board comprising a certain cell and a reference board comprising a cell on a user interface,*” (emphasis added) as recited in independent Claim 20, or as similarly recited in independent Claim 33, and “*receiving the password corresponding to the certain cell of the matching board matched by a user with the cell of the reference board comprising a password symbol,*” (emphasis added) as further recited in independent Claim 20, and “*displaying a movement of one of the matching board and the reference board with respect to the other* in accordance with a user interfacing with the user interface,” (emphasis added) as further recited in independent Claim 33.

Also, Kazuhiko does not teach or suggest “*displaying a first set of symbols including a symbol private to a user; displaying a second set of symbols including a symbol private to the user; and displaying matching of the symbol of the first set private to the user with the symbol of the second set private to the user, concurrently with matching of one or more other symbols of the first set with corresponding one or more symbols of the second set, to prevent revealing of the symbol of the first set and the symbol of the second set private to the user,*” as recited in independent Claim 39.

Applicants further submit that Smith does not remedy the deficiencies of Kazuhiko. Accordingly, a *prima facie* case of unpatentability has not been established and allowance of the independent Claim 21, 33 and 39 is respectfully requested.

Because at least the above arguments put independent Claims 21, 33 and 39 in condition for allowance, then, at least because of their dependence on these claims respectively, dependent Claims 22-31, 34-38 and 40 are also in condition for allowance. Applicants also submit that dependent claims speak for themselves and are further allowable for respective features recited therein.

Attorney Docket No.: 16000.UNS.003

The application as now presented, containing Claims 21-40 are believed to be in condition for allowance. Early allowance of the same is respectfully solicited. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters or place any issue in better condition for Appeal, the Examiner may contact Applicants' representative at the number given below.

Respectfully submitted,

October 9, 2008

/Charles Y. Park/

Charles Y. Park

Reg. No. 50,709

McNeely Bodendorf LLP

TEL: (202) 429-3789

FAX: (202) 478-1813